

1 JASON M. FRIERSON
United States Attorney
2 Nevada Bar No. 7709
JULIE A.K. CUMMINGS, SBN HI 10635
3 Special Assistant United States Attorney
Office of Program Litigation, Office 7
4 Social Security Administration
6401 Security Boulevard
5 Baltimore, MD 21235
410-966-1551
6 Julie.Cummings@SSA.gov

7 Attorneys for Defendant

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10
11 SALENA ELLEN YANEZ,

12 Plaintiff,

13 vs.

14 CAROLYN COLVIN,
15 Acting Commissioner of Social Security,

16 Defendant.¹
17

Case 2:24-cv-01416-BNW

STIPULATED MOTION FOR REMAND
and [PROPOSED] ORDER

18
19 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
20 attorneys, and with the approval of the Court, that the Commissioner of Social Security has agreed
21 to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The purpose
22 of the remand is to offer Plaintiff a new decision.

23 On remand, the Appeals Council will direct the ALJ to develop the record as necessary, to
24 provide the claimant an opportunity to submit additional evidence in support of her claim, and to
25 issue a new decision.

26
27 ¹ Carolyn Colvin became the Acting Commissioner of Social Security on November 30,
28 2024. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be
substituted for Martin O'Malley as the defendant in this suit. No further action need be taken to
continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42
U.S.C. § 405(g).

1 The parties further request that the Clerk of the Court be directed to enter a final judgment
2 in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

3 DATED December 11, 2024.

Respectfully submitted,

4 Law Offices of Lawrence D. Rohlifing, Inc., CPC

5 By: s/ Marc V. Kalagian
6 MARC V. KALAGIAN
7 Attorney for Plaintiff
8 (By email authorization)

9 JASON M. FRIERSON
10 United States Attorney

11 By: s/ Julie A.K. Cummings
12 JULIE A.K. CUMMINGS
13 Special Assistant United States Attorney
14 Office of Program Litigation, Office 7

Attorneys for Defendant

15
16
17
18 IT IS SO ORDERED:

19 
20 HON. BRENDA WEKSLER
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: December 12, 2024
23
24
25
26
27
28